

From: "Bottcher, Helen" <Bottcher.Helen@epa.gov>  
To: [christine.m.budai@usace.army.mil](mailto:christine.m.budai@usace.army.mil)  
Date: 4/21/2022 5:02:21 PM  
Subject: FW: USACE proposal to dredge sediment on south side of Bradford Island  
Attachments: [BON BIFL Sediment Quality Summary 20211012.pdf](#)  
[Bradford Is. Fish Ladder Sed Eval 20160128.pdf](#)

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**From:** Bottcher, Helen  
**Sent:** Thursday, April 21, 2022 4:28 PM  
**To:** Holm, James A CIV USARMY CENWP (USA) <[James.A.Holm@usace.army.mil](mailto:James.A.Holm@usace.army.mil)>; Hoffman, Erika <[Hoffman.Erika@epa.gov](mailto:Hoffman.Erika@epa.gov)>  
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**Subject:** RE: USACE proposal to dredge sediment on south side of Bradford Island

Hi, James. Thanks for getting back to me so quickly. I don't know who the Corps contact is for the proposed dredging project. Am guessing Stacy Jensen since you included Stacy on your message to me.

I am copying Christine Budai in the Portland District – she is my Corps counterpart on the CERCLA project, and I don't know whether she is aware of this proposed dredging.

I would like to learn more about this project, especially if the work is going to happen in 2022. I have a conflict on May 11 but am generally available on Wednesdays from 1:00 to 2:30. I look forward to joining a future meeting and learning more.

Regards,

Helen Bottcher  
EPA Superfund Remedial Project Manager

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**From:** Holm, James A CIV USARMY CENWP (USA) <[James.A.Holm@usace.army.mil](mailto:James.A.Holm@usace.army.mil)>  
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**Subject:** RE: USACE proposal to dredge sediment on south side of Bradford Island

Thanks Erica for the connection!

Hi Helen,

Attached is the 2021 sediment summary Dom and I did for this small work using the 2018 SEF as our guide.

We (Portland District's Sediment Quality Team) do sediment reviews of available data (Level 1 SEF reviews) and sediment sampling (Level 2A) as part of the initial investigation for Corps project teams to inform their design and alternative decisions. It's typically on very small projects relative to navigational dredging. These initial reviews

aren't always run through PSET because the Corps project team might decide to not dredge (lack of funds, chose a different option, change the design) or it is going upland (no 404 discharge). If the project team does want to put it back in the river, we take those through PSET when they do their environmental clearances (NEPA, ESA). At the time of our sampling, this project team was still considering options. Do you have a Corps contact on this project?

Attached is the 2016 sediment evaluation that has a brief history of past sampling and dredge events at the fish ladder exit, as well as other relevant work we were tracking at that time.

Are you available on Wednesday afternoons between 1:00 and 2:30 PM? That is when PSET meets weekly and I can setup a 30-minute window to talk about this project and Bradford Island in general. If you are looking for a more detailed discussion, we need to find a separate call time.

Cheers,  
James

James A. Holm  
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*Pronouns: He, Him, His*

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**Subject:** [Non-DoD Source] FW: USACE proposal to dredge sediment on south side of Bradford Island

James,

Looks like there needs to be some EPA CERCLA Bradford Island/PSET coordination. Can you connect with Helen (RPM for Bradford Island) to arrange her coming to the next call when this project will be discussed?

Thanks  
Erika

[illegible]

Erika Hoffman (she/her) | Biologist | U.S. Environmental Protection Agency Washington Operations Office | 300 Desmond Drive, Suite 102 | Lacey, WA 98503 | 360.753.9540 |

**From:** Bottcher, Helen <[Bottcher.Helen@epa.gov](mailto:Bottcher.Helen@epa.gov)>  
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**Subject:** USACE proposal to dredge sediment on south side of Bradford Island

Hi, Justine and Erika.

Please see the attached dredging proposal, which was brought to my attention yesterday evening. USACE proposes to dredge approx. 215 CY of sediment in front of the fish ladder at the Bonneville dam. The ladder is on the south shore Bradford Island, just downstream of known areas of PCB contamination. Bradford Island was recently added to the NPL list. USACE did "sampling" and the numbers *look* good. But I am concerned because:

- "Sampling" was just one grab sample; not representative of entire dredge area
- Unclear how deep the dredging will be and whether the sediment "sampling" covered that depth profile
- No Z samples collected
- USACE plans to dispose of dredged sediment in the upland portion of Bradford Island, which raises land disposal questions
- I do not think they applied for a permit for this dredging
- I am unaware of any CWA 404 or ESA consideration / documentation

Who handles dredge permitting and CERCLA coordination in your shop in Oregon? This is in the Columbia River, but clearly on the Oregon side.

Thanks --

[Helen Bottcher \(she/her\)](#) | [U.S. Environmental Protection Agency, Region 10](#)  
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